

# NVNO

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July 8, 2019

**VIA E-MAIL**

Hon. Norman A. Mordue  
Senior U.S. District Judge  
James M. Hanley Federal Building  
100 South Clinton Street  
P.O. Box 7336  
Syracuse, New York 13261-7336

Re: Breitenbach v. USA, et al.  
1-16-cv-00011 (NAM/CFH)  
Our File No.: 05779

Dear Judge Mordue:

On behalf of my clients and co-defendant U.S.A. I have filed a partially executed joint pre-trial stipulation. Co-defendant's counsel actively participated in the preparation of the partially executed Joint Pre-Trial Stipulation I have filed today.

I have sought out input and additions from plaintiff's counsel since June 19, 2019 but have received no response despite several calls and emails. On July 2, 2019, I provided a draft Joint Pre-Trial stipulation to plaintiff (receipt of which was acknowledged) but still received no response despite assurances that material would be provided this morning.

Very truly yours,

NAPIERSKI, VANDENBURGH,  
NAPIERSKI & O'CONNOR, LLP

By: 

SHAWN F. BROUSSEAU

**VIA CM/ECF**

cc: William J. White, Esq.  
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